

considered as the number of IXCs was not expected to surpass that number. If the assignment was limited to IXCs and the IXCs were limited in the number of codes assigned, there would not be an exhaustion problem at the present time. But, all purchasers of access can request a CIC for abbreviated access and some of the purchasers have multiple codes. In the existing three-digit CIC environment, the NANPA guidelines allow any access purchaser a maximum of three domestic codes and one international code, as well as the right to grandfather existing codes obtained from acquisitions and mergers. Given that all access customers can request CICs and each access customer can have up to four CICs not including those obtained through mergers and acquisitions, expansion becomes necessary.

The expansion of FGD CICs to four digits creates technical problems for the LECs. The permissive use of three- (10XXX) and four-digit (10XXXX) CICs will be allowed while the national network of 20,900 central offices migrates to the end-game four-digit format (101XXXX). Ambiguous CICs (XXX and XXXX), planned for use during the transition period, create timing problems for switches. An access tandem will be required to accept CICs from some end offices on a three-digit basis and other end offices on a four-digit basis. With an unambiguous CIC, the exact number of digits in the CIC is guaranteed; whereas, with an ambiguous code a switch must employ timing to determine if the CIC is a three- or a four-digit code. Many of the older stored program control switches require the use of unambiguous CICs. The only resolution to this timing problem is a "flash cut" of the entire nation to the end-game four-digit format (101XXXX) which is a practical impossibility.

A preliminary cost estimate developed by GTE Telephone Operations for FGD expansion in equal access end offices in its network was estimated in excess of 40 million dollars. This cost included switch and operational support system modifications associated with the conversion. It does not include costs incurred for FGB expansion which accomplish some FGD expansion requirements, nor did it include costs associated with using an ambiguous CIC during the conversion period. It is believed that employing an ambiguous CIC during the conversion would dramatically increase the total cost and impact network efficiency.

Expanding the CIC to four digits causes increased costs for a LEC. As such, it is imperative that the conversion be accomplished in a minimum amount of time, eighteen months at the absolute maximum in order to limit costs and network inefficiencies. From the perspective of the access customer, modification of the CAC to seven digits (101XXXX) would result in a negative impact on its customers since casual dialing requires the customer to dial two additional digits. This is compounded by customer notification and retraining issues. GTE is not aware of any alternative technical approaches that are less costly or technically superior to the proposed method if expansion is required.

The ICCF has developed and reached consensus on a document which describes guidelines for the assignment of CICs made directly by the NANPA to a specific entity in World Zone 1.²¹ These guidelines govern the assignment of both three- and four-digit CICs. Although an "entity" in the guidelines is defined

²¹ ICCF, "Carrier Identification Code (CIC) Administrative Guidelines," ICCF 92-0726-002, June 11, 1992.

"as a firm or group of firms under common ownership or control,"²² industry consensus could not be reached on the disposition of CICs obtained through mergers and acquisitions; therefore, an entity will be able to retain CICs obtained in this manner in addition to the allowable limit established in the guidelines. GTE strongly feels that merger and acquisition codes should be included in the number of codes assigned to an entity.²³ Although GTE's position on assignment is not the same as that in the ICCF guidelines, GTE recommends that these guidelines be used to govern the assignment, recall, transfer, and use of the available three-digit FGD codes in the event that the resource is not expanded.

CONCLUSION

Should the Commission decide to adopt rules or new policies based on the record developed in this Inquiry, GTE urges the FCC to explore all options for the USNA. Funding and the degree of separation of the NANPA function from the rest of Bellcore are key issues. Whether a new industry forum or the use of existing industry fora is another area that will require analysis.

Planning for PCS numbering should include the capability to allow number portability while maintaining dialing parity under the plan used. While full local number portability is not currently feasible, GTE recognizes that this capability will probably need to be made available in the future. Most issues involved in CIC code expansion have been resolved in industry meetings, however,

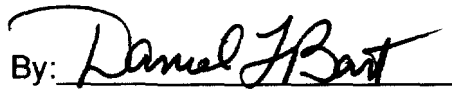
²² Id., at 2.

²³ Since the GTE Telephone Companies operate in 40 states, GTE supports more CICs than any other LEC.

significant costs are involved in this implementation and the transition period needs to be kept as short as possible. In the event that 3-digit CICs are not expanded, GTE still urges the use of the ICCF guidelines on number of codes per entity, except GTE feels strongly that merger and acquisition codes should be included in the number assigned to an entity.

Respectfully submitted,

GTE Service Corporation,
on behalf of its affiliated telephone
operating companies and
GTE Mobile Communications

By: 
Daniel L. Bart
1850 M. Street, N.W., S.1200
Washington, DC 20036
202-463-5212

December 28, 1992

Their Attorney

Certificate of Service

I, Suzanne Carmel, hereby certify that copies of the foregoing "GTE's Comments" have been mailed by first class United States mail, postage prepaid, on this 28th day of December, 1992 to all parties of record.


Suzanne Carmel

Michael F. Altschul
Cellular Telecommunications Industry Assn
1133 21st Street, NW
Third Floor
Washington, DC 20036

Daryl L. Avery
General Counsel
Public Service Commission
of the District of Columbia
450 Fifth Street, N.W.
Eight Floor
Washington,, DC 20001

Campbell L. Ayling
Attorney
NYNEX Operating Companies
120 Bloomingdale Rd.
White Plains, NY 10605

Francine J. Berry
Attorney
American Telephone
and Telegraph Company
295 North Maple Ave.,
Room 3244J1
Baskin Ridge, NJ 07920

Russell M. Blau
Attorney
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, DC 20007

David Cosson
Attorney
National Telephone Cooperative Assoc.
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

Jane A. Fisher
Attorney
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Theodore D. Frank
Attorney
Arent, Fox, Kintner, Plotkin & Kahn
1050 Connecticut Ave., N.W.
Washington, DC 20036-5339

Mark R. Hamilton
Executive Vice Pres.-External Affairs
McCaw Cellular Communications, Inc.
5400 Carillon Point
Kirkland, WA 98033

Rodney W. Johnson
Chairman
Spectrum Measurement Corporation
2820 Grant Street
Concord, CA 94520

P. G. Jollymore
Vice President
Telecom Canada
410 Laurier Avenue West
Box 2410, Station D
Ottawa, ONTARIO K1P 6H5 Canada

Floyd S. Keene
Attorney
Ameritech Operating Companies
2000 West Ameritech Center Drive
4H84
Hoffman Estates, IL 60196-1025

Jay C. Keithley
Vice President, Lay/External Affairs
United Telecommunications, Inc.
1850 M Street, N.W., Suite 1110
Washington, DC 20036

Charles H. Kennedy
Attorney
Bell Atlantic Telephone Companies
1710 H Street, N.W.
Washington, DC 20006

A. Allan Kurtze
Senior Vice President - Planning
Centel Corporation
8725 West Higgins Road
Chicago, IL 60631

Andrew D. Lipman
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, DC 20007

William A. Mason
Director
Rogers Contel, Inc.
10 York Mills Road
North York, ONTARIO M2P 2C9 Canada

Martin T. McCue
Linda Kent
United States Telephone Association
900 19th Street, NW
Suite 800
Washington, DC 20006-2105

Stanley J. Moore
Attorney
Pacific Bell & Nevada Bell
1275 Pennsylvania Ave., N.W.
Washington, DC 20004

Genevieve Morelli
Vice President & General Counsel
Competitive Telecommunications
Association
1140 Connecticut Ave., N.W.
Suite 220
Washington, DC 20036

Roy L. Morris
Deputy General Counsel
Allnet Communications Services, Inc.
1990 M Street, N.W.
Suite 500
Washington, DC 20036

W. Richard Morris
Attorney
United Telephone Operating Co.
Box 11315
Kansas City, MO 64112

Thompson T. Rawls, II
Attorney
BellSouth Operating Companies
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, GA 30367-6000

Paul Rodgers
General Counsel
National Association of
Regulatory Utility Commissioners
1102 ICC Building
P.O. Box 684
Washington, DC 20044

Lawrence E. Sarjeant
US West Communications
1020 19th Street, N.W.
Suite 700
Washington, DC 20036

Cindy Z. Schonhaut
Director, Legislative & Regulatory Affairs
Metropolitan Fiber Systems, Inc.
Government Affairs Office
3000 K Street, NW
Suite 300
Washington, DC 20007

Carol R. Schultz
Attorney
MCI Telecommunications Corporation
Technical Regulatory Affairs
1801 Pennsylvania Ave. N.W.
Washington, DC 20006

R. Michael Senkowski
Attorney
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

John C. Shapleigh
Attorney
The Association for Local
Telecommunications Services
1150 Connecticut Ave., N.W.
Washington, DC 20036

Michael S. Slomin
Attorney
Bell Communications Research, Inc.
290 West Mt. Pleasant Avenue
Livingston, NJ 07039

Josephine S. Trubek
Attorney
Rochester Telephone Corporation
Rochester Tel Center
180 South Clinton Ave.
Rochester, NY 14646-0700

James P. Tuthill
Attorney
Pacific Telesis Group
Pacific & Nevada Bell
140 New Montgomery St., Rm. 152
San Francisco, CA 94105

William E. Wyrrough, Jr.
Assoc. General Counsel
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850